

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BNP PARIBAS S.A., BNP PARIBAS  
ARBITRAGE SNC, BNP PARIBAS BANK &  
TRUST (CAYMAN) LIMITED, BGL BNP  
PARIBAS LUXEMBOURG S.A., and BNP  
PARIBAS SECURITIES SERVICES S.A.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01576 (SMB)

**STIPULATION EXTENDING TIME  
TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities and the estate of Bernard L. Madoff, and defendants BNP Paribas S.A., BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust (Cayman) Limited, and BNP Paribas Securities Services S.A. (collectively, "Defendants"), by and through their undersigned counsel herein, that the time by which Defendants may move, answer, or otherwise respond to the Trustee's amended complaint (Adv. Pro. No. 12-01576, ECF Doc. #100) (the "Amended Complaint") pursuant to the Court's *Order on Plaintiff's Motion for Leave to Serve*

*Amended Complaint and Defendants' Motion to Dismiss Amended Complaint*, entered October 18, 2018 (Adv. Pro. No. 12-01576, ECF Doc. #150) (the "Order") is extended up to and including January 17, 2019. The pre-trial conference will be scheduled for January 23, 2019, at 10:00 a.m.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for Defendants to move, answer, or otherwise respond to the Amended Complaint. This is the first such extension of the deadline set in the Order. Nothing in this Stipulation is a waiver of Defendants' right to request from the Court a further extension of time to move, answer, or otherwise respond to the Amended Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation, any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Court's *Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences* (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 18093).

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Dated: December 14, 2018  
New York, New York

**BAKER & HOSTETLER LLP**

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Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of  
Bernard L. Madoff*

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